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*Attorneys for Defendant  
Walmart Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JESSICA LIS,

Plaintiff,

vs.

WALMAR INC. and DOES I through X,  
inclusive,

Defendant(s).

Case No.: 2:20-cv-01324-JCM -EJY

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

**[THIRD REQUEST]**

Plaintiff JESSICA LIS (hereinafter “Plaintiff”) and Defendant WALMART INC. (hereinafter “Defendant” or “Walmart”), by and through their respective counsel of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and discovery plan in this matter for a period of sixty (60) days for the reasons explained herein.

Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the third such discovery extension requested in this matter.

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**DISCOVERY COMPLETED TO DATE**

- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures;
- The parties have filed all required documents pursuant to ECF 2 to date;
- Plaintiff has provided provider specific authorizations;
- Defendant has served written discovery to Plaintiff and Plaintiff has submitted timely responses;
- Plaintiff has served upon Defendant written discovery and Defendant has submitted timely responses;

**DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Deposition of Plaintiff;
- Depositions of Plaintiff's treating physicians;
- Depositions of fact witnesses;
- Disclosure of experts by both parties;
- Depositions of expert witnesses and rebuttal expert witnesses; and
- Plaintiff to notice Defendant's 30(b)(6) deposition.

The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

The parties agree that, pending this Court's approval, extension of remaining discovery deadlines is appropriate, as the parties are attempting to settle this matter prior to the deadline for expert disclosures. As the deadline for expert disclosure is approaching and the parties would require additional time to determine whether mediation would be feasible and appropriate. Accordingly, the parties have agreed to a 60-day discovery extension in order to take Plaintiff's deposition and determine whether to mediate this matter prior to incurring additional fees and cost on retaining experts.

The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

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**~~PROPOSED~~ NEW DISCOVERY DEADLINES**

**Expert Disclosure Deadline:**

Currently: March 2, 2021

Proposed: **April 30, 2021**

**Rebuttal Expert Disclosure Deadline:**

Currently: March 31, 2021

Proposed: **May 31, 2021**

**Last Day to Amend Pleadings or Add Parties:**

Currently: December 1, 2020

Proposed: **March 31, 2021 (90 days prior to discovery cutoff)**

**Discovery Cut-Off Date:**

Currently: April 30, 2021

Proposed: **June 29, 2021**

**Dispositive Motion Deadline:**

Currently: May 28, 2021

Proposed: **July 27 2021**

**Proposed Joint Pre-Trial Deadline:**

Currently: June 25, 2021

Proposed: **August 24, 2021**

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If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 2nd day of February, 2021.

**TINGEY & TINGEY**

*/s/ Justin L. Dewey*

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*Attorneys for Plaintiff*

*Jessica Lis*

DATED this 2nd day of February, 2021.

**PHILLIPS, SPALLAS & ANGSTADT LLC**

*/s/ Latisha Robinson*

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*Attorneys for Defendant*

*Walmart Inc.*

**IT IS SO ORDERED; provided, however, no further extensions of discovery will be granted absent a demonstration of substantial progress toward completing all discovery that remains to be done as identified in the present stipulation.**

  
UNITED STATES MAGISTRATE JUDGE

**DATED: February 2, 2021**